

ENCLOSURE 13.1
12/19/02

December 19, 2002

Ms. Linda Meyer
U.S. EPA Region X
1200 6th Ave
M.S. WCN-121
Seattle, Washington 98101

**Re: IDEQ Comments on the, Remedial Design Report and
Remedial Action Work Plan, Dewatering Pit Solids Removal, Simplot
Plant Area, Eastern Michaud Flats Superfund Site, November 25,
2002**

Dear Ms. Meyer:

The Idaho Department of Environmental Quality (DEQ) has reviewed the above mentioned report and offer the following comments.

The DEQ is in agreement with the new method to demonstrate compliance with the revised performance standards. The DEQ approves of using 11 mg/Kg of arsenic and 2.4 mg/Kg of beryllium as the confirmation standard. The DEQ however, does not agree that only these concentrations should be reported. We therefore request that all chemicals of concern are analyzed for and the concentrations reported.

EPA's approval letter requires that Simplot provide all analytical results produced by method 3050/6010B.

The DEQ also takes exception that in section 3.2 of the report that the excavation will terminate at a total depth of three feet below the visually identified residual solids. Excavation apparently will be halted even if the arsenic and beryllium concentrations exceed the confirmation standard. This seems to limit the removal of contaminated soil resulting from leaching. We request that all remaining soil meet the confirmation standard.

Since the pathway of concern was ingestion of metals contaminated soils, removal of soils to a depth of 3 feet and backfilling with clean fill or lining this area to serve as a waste management area should mitigate the risks. EPA did not request a change to the proposed work.

Please contact me at (208) 236-6160 if you have any questions or concerns regarding this matter.

Sincerely,



Douglas M. Tanner
Regional Environmental Manager

C: Tiffany Floyd, DEQ-Pocatello
Dean Nygard, DEQ-Boise
Ward Wolleson, Simplot-Boise
Roger Turner, Shoshone Bannock Tribes